

IN THE UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In re:)	Chapter 7
)	Bankruptcy No. 18-13383
JACK CARLTON CRAMER JR.,)	
)	STIPULATED MOTION FOR AN
Debtor(s).)	AMENDED ORDER APPROVING
)	COMPROMISE OF CLAIM

COME NOW the debtor, Jack Carlton Cramer Jr., though counsel, Henry & DeGraaff, P.S., and Christina L. Henry, and the duly appointed trustee, Edmund J. Wood, through counsel The Livesey Law Firm, and Rory C. Livesey, and stipulate as follows:

On August 25, 2020, this Court entered an order approving a settlement between the trustee and the debtor (Docket No. 212). The settlement authorized the debtor to proceed with his efforts to obtain a reverse mortgage on his residence located at 15605 - 63rd Avenue N.E., Kenmore, Washington 98028, and use the proceeds to pay the enumerated creditors. The original order addressed the disputed Claim No. 4 of 21st Mortgage Corporation. Funds to pay Claim No. 4 were to be set aside awaiting the outcome of the debtor's challenge to the claim.

The debtor has successfully challenged Claim No. 4 of 21st Mortgage Corporation and the claim has been withdrawn.

The debtor and the trustee are requesting that the Court entered an amended order approving the settlement that removes 21st Mortgage Corporation and Claim No. 4 from the list of creditors being paid. The claim made up approximately 26 percent of the claims against the estate and will substantially reduce the amount of money the debtor will need to secure from the reverse mortgage. The expectation is an amended order showing less debt will facilitate the debtor's reverse mortgage.

1 Notice to creditors of this motion is not necessary as it does not impact the distribution to
2 the remaining creditors authorized in the original order.

3 WHEREFORE, the parties pray for an order accordingly.

4 RESPECTFULLY SUBMITTED this 8th day of January, 2021.

5 THE LIVESEY LAW FIRM

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7 */S/ Rory C. Livesey*

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Rory C. Livesey, WSBA #17601
Attorney for Edmund J. Wood, Trustee

9 RESPECTFULLY SUBMITTED this 8th day of January, 2021.

10 HENRY & DEGRAFF, P.S.

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12 */S/ Christina L. Henry*

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Christina L. Henry, WSBA #31273
14 Attorney for Jack Carlton Cramer Jr., Debtor